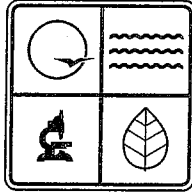


STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI AIR CONSERVATION COMMISSION



**PERMIT BOOK**

**PERMIT TO CONSTRUCT**

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

**07 2006 - 001**

Permit Number:

Project Number: **2006-04-008**

Owner: **Skeeter Products, Inc.**

Owner's Address: **1 Skeeter Road, Kilgore, TX 75662**

Installation Name: **G3 Boats**

Installation Address: **901 Cowan Drive, Lebanon, MO 65536**

Location Information: **Laclede County, S12, T34, R16**

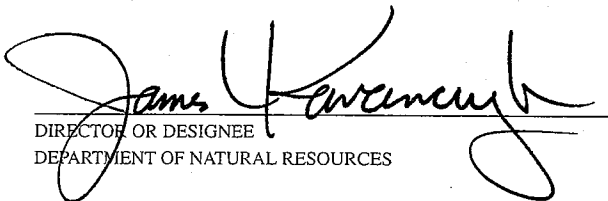
Application for Authority to Construct was made for:

**Installation of five (5) paint booths. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.**

- 
- ☐ Standard Conditions (on reverse) are applicable to this permit.
- ☒ Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

EFFECTIVE DATE

**JUL - 5 2006**

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

2006-04-008

Skeeter Products, Inc.

1 Skeeter Road, Kilgore, TX 75662

G3 Boats

901 Cowan Drive, Lebanon, MO 65536

Laclede County, S12, T34, R16

Installation of five (5) paint booths. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Page No.	2
Permit No.	
Project No.	2006-04-008

# SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

G3 Boats  
Laclede County, S12, T34, R16

1. Control Device – Panel Filter  
A panel filter must be in use at all times when the paint booths are in operation and shall be operated and maintained in accordance with the manufacturer's specifications.
2. Operational Requirements  
G3 Boats shall keep all Volatile Organic Compounds (VOC) and hazardous air pollutants (HAP) emitting paints in sealed containers whenever the materials are not in use. G3 Boats shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (6) REVIEW

Project Number: 2006-04-008  
Installation ID Number: 105-0038  
Permit Number:

G3 Boats  
901 Cowan Drive  
Lebanon, MO 65536

Complete: April 3, 2006  
Reviewed: May 31, 2006

Parent Company:  
Skeeter Products, Inc.  
1 Skeeter Road  
Kilgore, TX 75662

Laclede County, S12, T34, R16

REVIEW SUMMARY

- G3 Boats has applied for authority to install five (5) paint booths.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are Methyl Isobutyl Ketone (MIBK), Ethyl Benzene (EB), toluene, and xylene.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The Maximum Achievable Control Technology (MACT) standard, 40 CFR Part 63, Subpart VVVV, National Emission Standards for Boat Manufacturing applies to the proposed equipment. Subpart II, National Emission Standards for Shipbuilding and Ship Repair does not apply since the manufactured boats do not meet the definition of ships.
- Air filters are being used to control the particulate emissions from the equipment in this permit.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are below major threshold levels. Potential emissions of xylene and combined HAPs exceed the de minimis thresholds. This permit was not reviewed under Section (9) since the MACT, Subpart VVVV applies to the source.
- This installation is located in Laclede County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed for this review. No screen model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions. In addition, HAP emissions from the proposed equipment are subject to a MACT.
- Emissions testing is not required for the equipment.
- Revision to the installation's Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

### INSTALLATION DESCRIPTION

G3 Boats operates a small fishing and pleasure boat manufacturing plant located in Lebanon, Missouri. The installation currently operates four (4) paint booths (EP02, EP03, EP04 and EP06) in an existing building. This is an existing minor source for VOC and a major source for HAPs under construction permitting. The following permits have been issued to G3 Boats from the Air Pollution Control Program.

Permit Number	Description
1198-012	Installation of a paint booth (EP03).
052000-011	Installation of a paint booth (EP04).
OP2002-071	Part 70 Operating Permit
112001-010	Installation of a paint booth (EP06).

A Notice of Violation (NOV #11579SW) was issued for the violation of 10 CSR 10-6.060, which included the failure to keep records in accordance with a previous permit and MACT Subpart VVVV.

### PROJECT DESCRIPTION

G3 Boats is proposing to install five (5) new paint booths at their existing plant. A new building will be constructed to house the new paint booths. The new paint booths (EP07, EP08, EP09, EP10, and EP11) will be used to apply primer and finish coat paint to boat hulls using air assisted airless spray guns. Due to the nature of the painting taking place in the booths, no solvents are being used in association with these paint booths. Panel filters will be used to control particulate emissions.

The maximum hourly design rate (MHDR) for each booth was based on a coating rate of 0.5 gallons of primer and 0.75 gallons of finish paint per boat and a processing time of 0.5 hours per boat. The rates used to determine potential emissions were 1 gallon of primer per hour and 1.5 gallons of finish paint per hour.

## EMISSIONS/CONTROLS EVALUATION

A mass balance approach was used in the analysis of PM<sub>10</sub>, VOC and HAP emissions. For the purpose of calculating potential emissions from this application, it is assumed that all VOC and HAP contained in the coatings are emitted as pollutant. Percentage of VOC and HAP by weight and densities of the coatings were determined from Material Safety Data Sheets (MSDS) provided by the applicant. The worst case scenario for each pollutant was used to determine potential emissions.

PM<sub>10</sub> emissions were evaluated based on the solid content of the coatings and a transfer efficiency of 50% from the spray gun. PM<sub>10</sub> emissions will be controlled through the use of panel fabric filters. A control efficiency of 90% was used in the determination of potential emissions.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing potential emissions were determined using information from previous permits. Existing actual emissions were taken from the installation's 2005 Emissions Inventory Questionnaire (EIQ). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	1.78	0.00	6.53	N/A
SO <sub>x</sub>	40.0	N/A	0.00	N/A	N/A
NO <sub>x</sub>	40.0	N/A	N/A	N/A	N/A
VOC	40.0	116.5	26.09	127.26	N/A
CO	100.0	N/A	N/A	N/A	N/A
HAPs	25.0	39.1	N/A	62.32	Subpart VVVV
Toluene**	10.0	N/D	N/D	5.37	Subpart VVVV
Xylene**	10.0	N/D	N/D	12.26	
MIBK**	10.0	N/D	N/D	6.04	
EB**	10.0	N/D	N/D	3.07	

\*N/A = Not Applicable; N/D = Not Determined

\*\* The Screen Modeling Action Level and the Regulatory De Minimis Levels are equivalent for these individual HAPs.

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are below major threshold levels. Potential emissions of xylene and combined HAPs exceed the de minimis thresholds. This permit was not reviewed under Section (9) since the MACT, Subpart VVVV applies to the source.

## APPLICABLE REQUIREMENTS

G3 Boats shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

### SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes, 10 CSR 10-6.400*
- *Maximum Achievable Control Technology (MACT) Regulations, 10 CSR 10-6.075, National Emission Standards for Boat Manufacturing, 40 CFR Part 63, Subpart VVVV*



## STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Emily E. Wilbur  
Environmental Engineer

\_\_\_\_\_  
Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated March 30, 2006, received April 3, 2006, designating Skeeter Products, Inc. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southwest Regional Office Site Survey, dated April 18, 2006.

Ms. Stacey Pearcy  
HR Director  
G3 Boats  
901 Cowan Drive  
Lebanon, MO 65536

RE: New Source Review Permit - Project Number: 2006-04-008

Dear Ms. Pearcy:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH:ewl

Enclosures

c: Southwest Regional Office  
PAMS File 2006-04-008

Permit Number: